

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-5, 7-9, 11, 12 and 14-18 remain active in this application; Claim 1 is amended and Claim 6 is canceled by the present amendment; and Claims 10 and 13 were previously canceled.

In the outstanding Office Action, Claim 6 was objected to; Claims 1-4 and 16 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,841,723 to Ma; Claims 7 and 8 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of U.S. Patent No. 5,272,371 to Bishop et al. (herein "Bishop"); Claim 9 was rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of U.S. Patent No. 5,959,820 to Ker et al. (herein "Ker 2"); Claims 5, 6 and 11 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of Ker 2 and Sedra et al., "Microelectronic Circuits" (herein "Sedra"); Claims 12 and 14 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of U.S. Patent No. 5,400,202 to Metz et al. (herein "Metz"); Claim 15 was rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of Metz and further in view of Court Decision St. Regis Paper Co. v. Bemis Co., 193 USPQ 8; Claims 16 and 17 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of U.S. Patent No. U.S. 6,365,938 to Lee et al. (herein "Lee"); and Claim 18 was rejected under 35 U.S.C. § 103(a) as unpatentable over Ma in view of Lee and U.S. Patent No. U.S. 5,682,049 to Nguyen.

In view of the cancellation of Claim 6, the issues raised with respect to Claim 6 are moot.

Further, Applicants respectfully traverse the rejections of claims as anticipated or as unpatentable over Ma, with respect to amended Claim 1.

Amended Claim 1 is directed to an ESD protection circuit that includes, *inter alia*, a first pad which is used as an external connection terminal to be connected to a semiconductor integrated circuit, a second pad which is used as an external connection terminal to be connected to the semiconductor integrated circuit, and a clamp circuit connected to the first pad and the second pad.

In a non-limiting example, Applicants' Figure 8 shows an ESD protection circuit including external connection terminal first pad 51, which is connected to an internal circuit 54 (e.g., semiconductor integrated circuit). The ESD protection circuit in this example also includes VSS external connection second pad 52, which is also connected to the internal circuit 54. Further, a switch circuit 65 (e.g., clamp circuit) is connected to the first pad 51 and the second pad 52.

This arrangement advantageously allows the clamp circuit of the claimed invention to turn on when ESD is applied, so as to release the ESD.

Applicants respectfully submit that Ma does not teach or suggest the claimed structure and does not achieve the same advantages. Ma describes an NMOS transistor 50 whose current path is not connected to a Vcc terminal. In particular, although the NMOS transistor 50 of Ma is connected to ground (e.g., first pad), the NMOS transistor 50 in Ma is not also connected to Vcc (e.g., second pad).¹ Further, Ma indicates that the NMOS transistor 50 is turned on when the anti-fuse is not being programmed, so as to supply ground voltage to one end of the anti-fuse, which is different than the operation of the claimed invention. Accordingly, Applicants respectfully submit that Ma does not teach or suggest an ESD protection circuit including "a clamp circuit connected to the first pad and the second pad," as recited in amended Claim 1.

¹ Ma at Figure 5.

Accordingly, Applicants respectfully submit that Claim 1 and claims depending therefrom patentably define over Ma.

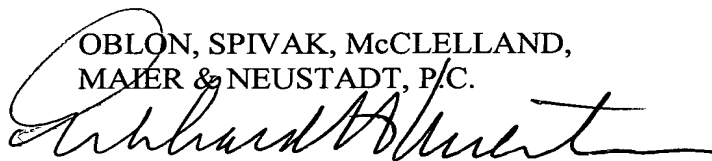
In addition, it is respectfully submitted that none of the remaining references in the outstanding Office Action, applied separately or in combination, teach or suggest the claimed features lacking in the disclosure of Ma.

Accordingly, it is respectfully submitted that Claim 1 and claims depending therefrom are allowable.

Consequently, in view of the present amendment, and in light of the above discussion, no further issues are believed to be outstanding, and the present application is believed to be in condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P/C.



Eckhard H. Kuesters
Attorney of Record
Registration No. 28,870

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

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